

WALLACE W. WALKER, JR., ESQ.  
7774 Oakhurst Circle  
P.O. Box 470340  
Cleveland, OH 44147-0340  
Tel: (440) 526-4244  
(WWW/2009)

**Objection Deadline: June 19, 2007**  
**Enlarged to June 21, 2007 @ 5:00pm**  
**Hearing Date: June 26, 2007 @ 10:00am**

JAMES R. KANDEL, ESQ.  
101 Central Plaza, S.  
Chase Tower, Suite 1003  
Canton, OH 44702  
Tel: (330) 453-4444  
Attorneys for Flex Technologies, Inc.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

Chapter 11

In re

DELPHI CORPORATION, et. al.,

Case No. 05-44481 (RDD)  
(Jointly Administered)

Debtors

---

OPPOSITION OF FLEX TECHNOLOGIES, INC. TO DEBTORS' FIFTEENTH  
OMNIBUS CLAIMS OBJECTION  
[PROOF OF CLAIM NO. 11542]

Flex Technologies, Inc. ("FlexTech"), an Ohio corporation, a creditor and a party in interest, by and through its attorney, Wallace W. Walker, Jr., hereby responds to the Debtors' Fifteenth Omnibus Claims Objection (Substantive) (the "Objection") and respectfully states:

1. FlexTech admits that it timely filed its Proof of Claim, Claim No. 11542 (the "Claim"). A copy of the Claim is annexed.

2. As of October 8, 2005 (the "Petition Date") the Debtors were indebted to FlexTech in the amount of \$72,759.50 on an account ("Account") for trim, tube assemblies, cables, cable assemblies, casings, springs, locks and other auto parts sold and

delivered by FlexTech to Debtors in compliance with written purchase orders on terms evidenced by the invoices and shipping documents (collectively “Invoices”) annexed hereto in support of the Account and the Claim. The Invoices are incorporated herein by this reference. The Invoices have been organized by Customer and generally in the order listed in the Account. Unless a specific Invoice is to be supplied, the Invoices annexed to this response are as follows:

a. CUSTOMER NUMBER 315 (DELCO ELECTRONICS):

Invoice #54083	\$607.08
Invoice #54116	\$607.08
Invoice #54203	\$607.08
Invoice #54254	\$607.08
Invoice #54302	<u>To be supplied (\$607.08)</u>
TOTAL	<u>\$3035.46</u>

b. CUSTOMER NUMBER 317 (DELPHI AUTOMOTIVE SYSTEMS):

Invoice #33516	\$172.80
Invoice #54290	\$227.60
Invoice #619638	\$1483.65
Invoice #619681	\$1348.41
Invoice #619702	\$540.96
Invoice #619703	\$968.94
Invoice #619720	\$1217.16
Invoice #619721	\$1453.41
Invoice #619727	\$1239.42
Invoice #619733	\$270.48
Invoice #619743	\$2077.11
Invoice #619757	\$2264.85
Invoice #619768	\$1968.12
Invoice #619776	\$2373.84
Invoice #619789	\$2723.07
Invoice #619809	\$2426.34
Invoice #619815	\$1671.89
Invoice #619830	<u>To be supplied (\$2561.58)</u>
Invoice #619843	\$2561.58
Invoice #619856	\$3613.26
Invoice #619881	\$1618.89
Invoice #619899	<u>To be supplied (\$1487.64)</u>
TOTAL	<u>\$36,270.50</u>

c. CUSTOMER NUMBER 317-1 (DELPHI E & C):

Invoice #32201	\$86.40
Invoice #32218	\$315.20
Invoice #32235	\$548.40
Invoice #32252	\$337.60
Invoice #32297	\$548.40
Invoice #32299	To be supplied (\$233.20)
Invoice #32215	To be supplied (\$446.40)
Invoice #32353	\$406.00
Invoice #32366	\$570.80
Invoice #32402	\$86.40
Invoice #32418	\$228.80
Invoice #32446	\$743.60
Invoice #32462	\$570.80
Invoice #30771	\$228.80
Invoice #30773	\$228.80
Invoice #30788	\$319.60
Invoice #30841	<u>\$462.00</u>
TOTAL	<u>\$6361.20</u>

d. CUSTOMER NUMBER 37004 (HARRISON DIVISION):

Invoice #54094	\$2352.60
Invoice #54140	\$2352.60
Invoice #54287	To be supplied (\$2352.60)
Invoice #54306	<u>To be supplied (\$2352.60)</u>
TOTAL	<u>\$9410.46</u>

e. CUSTOMER NUMBER #17000 (SAGINAW DIVISION, GMC):

Invoice #2238	<u>\$17682.00</u>
TOTAL	<u>\$17682.00</u>

3. FlexTech acknowledges that the Debtors' bankruptcy cases have been administratively consolidated and admits that the Claim was filed in Bankruptcy Case No. 05-44481 in compliance with the Court's orders relating to the consolidation. FlexTech denies for want of knowledge that the correct debtor is Delphi Automotive Systems, LLC.

4. Upon information and belief, the Debtors have not made any payments on the Claim on which the sum of \$72,759.50 remains justly due and owing.

WHEREFORE, FlexTech requests that its Claim be allowed in the bankruptcy case or cases of the Debtors obligated on the Account and the Claim and that the Court grant such other and further relief as is necessary and appropriate.

Dated: June 21, 2007  
Cleveland, Ohio

/s/Wallace W. Walker, Jr.